

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CYRANO, INC.,  
Plaintiff,

v.

QUOTIUM TECHNOLOGIES, INC.,  
QUOTIUM TECHNOLOGIES, S.A.,  
and  
TECHNOLOGIES, S.A.,  
Defendants.

**CIVIL ACTION NO. 05-CV-11558-DPW**

**ASSENTED-TO EMERGENCY MOTION FOR  
EXTENSION OF TIME WITHIN WHICH TO FILE  
OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Defendants Quotium Technologies, Inc., Quotium Technologies, S.A., and Technologies, S.A. (collectively, "Quotium") hereby respectfully move the Court to extend the time for filing Quotium's Opposition to Plaintiff's Motion for Preliminary Injunction from July 5, 2006 to July 14, 2006. As grounds for this motion, Quotium states as follows:

1. Plaintiff assents to the relief requested in this motion.
2. Plaintiff filed, on June 20, 2006, a motion for preliminary injunction in this action.
3. Accordingly, Quotium's Opposition brief is due on July 5, 2006.
4. Lead counsel for Quotium, Kevin J. O'Connor, has been on vacation from June 19, 2006 until June 29, 2006, just yesterday. Today, he is in Southern Massachusetts taking depositions in an unrelated matter. Mr. O'Connor was not in the office when Plaintiff's motion was filed.
5. Due to the schedule of Mr. O'Connor, as well as the Holiday and conflicting litigation schedule of the other Quotium attorneys on this matter (including

Mayeti Gametchu, who was tied up in emergency temporary restraining order proceedings this week in an unrelated matter), Quotium respectfully requests a brief extension of time within which to file its Opposition brief to July 14, 2006.

6. No party will be prejudiced by the relief requested herein, as Plaintiff assents to this motion. In addition, allowance of this motion is in the interests of justice and judicial economy, as it will allow counsel sufficient time to respond and address the complicated procedural, substantive, and international issues in this case.

WHEREFORE, Quotium respectfully requests that the Court allow Quotium until July 14, 2006 to respond to Plaintiff's motion for preliminary injunction.

Respectfully submitted,  
QUOTIUM TECHNOLOGIES, INC.,  
TECHNOLOGIES, S.A., and  
QUOTIUM TECHNOLOGIES, S.A.,  
By their attorneys,

/s/ Mayeti Gametchu  
Kevin J. O'Connor (BBO# 555250)  
Mayeti Gametchu (BBO# 647787)  
John Pagliaro (BBO# 634483)  
PARAGON LAW GROUP, LLP  
184 High Street  
Boston, MA 02110  
Tel. (617) 399-7950

DATED: June 30, 2006

**Local Rule 7.1 Certificate of Conferral**

I, Mayeti Gametchu, certify that on June 30, 2006, I conferred with Stephen Chow, Esq., counsel of record for the plaintiff, and Mr. Chow indicated that Plaintiff assents to the requested leave herein.

/s/ Mayeti Gametchu

**CERTIFICATE OF SERVICE**

I, Mayeti Gametchu, hereby certify that on June 30, 2006, I served a true and accurate copy of the forgoing document electronically to the registered participants of the ECF system, as identified on the Notice of Electronic Filing (NEF), by filing it through the ECF system, and by first class mail to those persons indicated as non-registered participants.

/s/ Mayeti Gametchu

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